

**BQC-93-016**

Date: March 3, 1993 BQC-93-016  
To: Hospitals HOSP 5  
From: Susan Wood, Deputy Director  
Bureau of Quality Compliance  
Subject: Clarification of Survey Instructions

Attached is a copy of Regional Program Letter No. 93-10 from the Division of Health Standards and Quality, Region V. The letter updates survey instructions for Prospective Payment System-Exempt Psychiatric Units--Occupational and Recreational Therapists. This letter also clarifies the intent of regulations regarding the provision of occupational and recreational therapy services in Prospective Payment System-Exempt Psychiatric Units.

Please share this information with appropriate staff. Questions regarding this letter should be forwarded to Stephen D. Schlough, Chief, Hospital and Health Services Section, Bureau of Quality Compliance, at the above address or telephone him at (608) 266-3878.

SW/JJF/jh 8148.nm

Attachment

cc: -BQC Staff  
-Office of Legal Counsel  
-Ann Haney, DOH Admin.  
-Kevin Piper, BHCF Dir.  
-HCFA, Region V  
-Illinois State Agency  
-Ohio State Agency  
-Michigan State Agency  
-Indiana State Agency  
-Minnesota State Agency  
-WI Coalition for Advocacy  
-Serv. Employees Internat'l Union  
-WI Counties Assn.  
-WI Health Mgmt. Info. Assn.  
-WI Assn. of Hospital SW and Discharge Planners  
-Admin., Division of Care and Treatment Facilities  
-Non-LTC BQC Memo Subscribers  
-WI Hospital Association

Department of Health & Human Services  
Health Care Financing Administration  
Region V  
105 West Adams Street  
15<sup>th</sup> Floor  
Chicago, Illinois 60603-6201

February 1993

Refer to: CO9

Division of Health Standards and Quality Regional Program Letter No. 93-10

Subject: Clarification to Survey Instructions for PPS-Exempt Psychiatric Units – Occupational and Recreational Therapists

The purpose of this Regional Program Letter is to clarify the intent of the regulations regarding the provision of occupational and recreational therapy services in PPS-exempt psychiatric units. The survey worksheet for psychiatric units (HCFA-437) should not be used as a checklist requiring these units to maintain full-time occupational and recreational therapists on staff.

The regulatory requirement at 42 CFR Part 412.27(d)(6) states that a psychiatric unit must provide a therapeutic activities program that is "appropriate to the needs and interests of the patients" and states that the "number of qualified therapists, support personnel, and consultants must be adequate" to provide the care needed by the patients.

There is no requirement for a PPS-excluded psychiatric unit to have an occupational therapist and recreational therapist employed full-time. The regulations do require the unit to meet the emotional, psychological, and physical needs of the patients. Therefore, the services of these professionals could be required, depending on the specific needs of the patients, but not in specific numbers or employment status (e.g., full-time).

Surveyors should also be aware that a PPS-excluded psychiatric unit has the option of providing these services through agreements or arrangements on an as-needed basis. Therefore, even if the services of occupational therapists and recreational therapists are required to meet patients' needs, there is no requirement for a unit to have full time staff in these categories as long as the needs of the patients are being met.

Questions regarding this clarification should be directed to your DHSQ Program Representative.

/s/ William F. Pfeifer